

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

John P. Leon JL4638 Scott M. Zauber SZ6086 William P. Rubley WR4169 Subranni Zauber LLC 750 Route 73 South – Suite 307B Marlton, N.J 08053 (609) 347-7000; FAX (609) 345-4545 Attorneys for Debtors	
In Re: RENAULT WINERY, INC. Debtor	Case No.: 14-33075-ABA Judge: Andrew B. Altenburg, Jr. Chapter 11
In re : RENAULT GOLF, LLC Debtor	Case No.: 14-33079-ABA Judge: Andrew B. Altenburg, Jr. Chapter 11
In re: TUSCANY HOUSE, LLC Debtor	Case No.: 14-33084-ABA Judge: Andrew B. Altenburg, Jr. Chapter 11
In re: RENAULT WINERY PROPERTIES, LLC Debtor	Case No.: 14-33080-ABA Judge: Andrew B. Altenburg, Jr. Chapter 11
In re: RENAULT REALTY CO., LLC Debtor	Case No.: 14-33082-ABA Judge: Andrew B. Altenburg, Jr. Chapter 11

**DEBTORS' MOTION SEEKING THE
JOINT ADMINISTRATION OF MULTIPLE DEBTOR BANKRUPTCY CASES**

Renault Winery, Inc., (“Renault”) and its above captioned affiliated debtors and debtors in possession (each “Debtor” and collectively “Debtors”)¹ hereby submit this motion (“Motion”) for the entry of an order, substantially in the form submitted concurrently herewith, pursuant to Rule 1015 of the Federal Rules of Bankruptcy Procedure and the General Order Adopting Guidelines Governing First Day Matters, dated March 31, 2003 signed by the Hon. Rosemary Gambardella, Chief Judge, United States Bankruptcy Court, District of New Jersey, which authorize the joint administration of the Debtors’ Chapter 11 cases and the consolidation thereof for procedural purposes. The facts and circumstances supporting this Motion are set forth in the concurrently filed Declaration of Dennis DelVeccio in Support of Debtors’ Chapter 11 Petitions and First Day Motions (“First Day Certification”).² In further support of this Motion, the Debtors respectfully state as follows:

JURISDICTION AND VENUE

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory and legal predicates for the relief sought herein are Bankruptcy Rule 1015 and 11 U.S.C. § 105.

BACKGROUND

2. On the date hereof (“Petition Date”), the Debtors filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code. Concurrently with this Motion, the Debtors have also filed other motions and applications seeking certain “first day” relief.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Renault Realty Co., LLC, (9787), Renault Golf, LLC (0618), Renault Winery Properties, LLC (7686), Tuscany House, LLC (6179), and Renault Winery, Inc. (7686).

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the First Day Certification.

3. The Debtors have continued in possession of their properties and have continued to operate and maintain their business as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

4. No request has been made for the appointment of a trustee or examiner and no official committee has been established in these Chapter 11 cases.

5. Additional information about the Debtors' business and the events leading up to the Petition Date can be found in the First Day Certification, which is incorporated herein by reference.

RELIEF REQUESTED

6. By this Motion, Debtors request the Court enter the Proposed Order, authorizing the joint administration of these Chapter 11 cases and the consolidation thereof for procedural purposes only.

7. Many, of not virtually all, of the motions, applications, hearings, and orders that will arise in these Chapter 11 cases will jointly affect all of the Debtors. For this reason, the Debtors respectfully submit that the interests of the Debtors, their creditors, and other parties in interest would be best served by the joint administration of these Chapter 11 cases. In order to optimally and economically administer the Debtors' Chapter 11 cases, such cases should be jointly administered, for procedural purposes only, under the case number assigned to Debtor, Renault.

8. The Debtors also request that the Clerk of the Court maintain one (1) file and one (1) docket for all of the Debtors' Chapter 11 cases, which file and docket shall be the file and docket for Renault. In addition, the Debtors proposed that the caption of these Chapter 11 cases be modified as follows:

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9. The Debtors also seek the Court's direction that a notation, substantially similar to the following proposed docket entry, be entered on the docket of each of the Debtor's Chapter 11 cases, other than the case of Renault, to reflect the joint administration of these Chapter 11 cases:

An Order has been entered in this case directing the consolidation and joint administration for procedural purposes only of the Chapter 11 cases of Renault Realty Co., LLC, Renault Golf, LLC, Renault Winery Properties, LLC, Tuscany House, LLC, and Renault Winery, Inc. The docket in the Chapter 11 Case of Renault Winery, Inc., Case No. 14-33075 should be consulted for all matters affecting this case.

BASIS FOR RELIEF

10. Pursuant to Bankruptcy Court Rule 1015(b), if two or more petitions are pending in the same court by or against a debtor and an affiliate, "the [C]ourt may order a joint administration of the estates." Fed.R.Bank.P. 1015(b). In these Chapter 11 cases, the Debtors are "affiliates," as that term is defined in Section 101(2) of the Bankruptcy Code.

11. Additionally, the Declaration of Dennis DelVeccio establishes that the joint administration of the Debtors' respective estates is warranted and will ease the administrative burden on the Court and all parties in interest in these Chapter 11 cases. Joint administration will also permit the Clerk of the Court to utilize a single docket for all of the Chapter 11 cases, and to combine notices to

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creditors and other parties in interest in the Debtors' respective cases. Because there will likely be numerous motions, applications and other pleadings filed in these cases that will affect all of the Debtors, joint administration will permit counsel for all parties in interest to include all of the Debtors' cases in a single caption for the numerous documents that are likely to be filed and served in these cases. Joint administration will also enable parties in interest in all of the Debtors' cases to stay apprised of all the various matters before the Court.

12. Joint administration will not prejudice or adversely affect the rights of the Debtors' creditors because the relief sought herein is purely procedural and is not intended to affect substantive rights. Joint administration will also significantly reduce the volume of paper that otherwise would be filed with the Clerk of the Court, render the completion of various administrative tasks less costly, and provide for greater efficiencies. Moreover, the relief requested by this Motion will also simplify supervision of the administrative aspects of these cases by the Office of the United States Trustee for the District of Delaware (the "U.S. Trustee").

13. For these reasons, the Debtors submit that the relief requested herein is in the best interests of the Debtors, their estates and creditors, and therefore should be granted.

NOTICE

14. Notice of this Motion has been provided to: (i) the Office of the United States Trustee for the District of New Jersey; (ii) the Office of the United States Attorney for the District of New Jersey; (iii) the Internal Revenue Service; (iv) the Debtors' twenty (20) largest unsecured creditors; and (v) counsel to the First Secured Creditor, OceanFirst Bank.

15. The Debtors have not previously sought the relief requested herein from this or any other Court.

CONCLUSION

WHEREFORE, the Debtors request entry of the proposed order, granting the relief requested herein and such other and further relief as is just and proper.

SUBRANNI ZAUBER LLC

/s/ John P. Leon.
John P. Leon JL4638
Jeanie D. Wiesner JW3209
William P. Rubley WR4169
Subranni Zauber LLC
750 Route 73 South – Suite 307B
Marlton, NJ 08053
(609) 347-7000; FAX (609) 345-4545
Attorneys for Debtors

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